

1.0 INTRODUCTION AND STATEMENT OF PURPOSE

1.0.1 The Defense Distribution Depot San Joaquin California, Tracy Site (DDJC-Tracy) is located in an unincorporated area of San Joaquin County, 1.5 miles southeast of Tracy, California; it is approximately 20 miles southwest of Stockton, California, and 60 miles east of San Francisco, California (Figure 1-1).

1.0.2 The DDJC-Tracy site began functioning as a depot in 1942. The Defense Logistics Agency (DLA) has operated DDJC-Tracy since 1963 as a storage and distribution depot for the United States military services in the western United States and the Pacific region. In late 1992, the DLA purchased an agricultural area north of the operating portion of DDJC-Tracy, called the Tracy Annex. The operating portion of the depot covers a 448-acre triangular parcel, and the Tracy Annex consists of approximately 460 acres (Figure 1-2).

1.0.3 Historical operations at the depot have included the handling and use of potentially hazardous materials. To address contamination associated with past practices for handling hazardous materials at the site, the *DDJC-Tracy Sitewide Comprehensive Record of Decision* (ROD) (Radian International, 1998a) was signed in April 1998. The ROD specifies remedies that are protective of human health and the environment, comply with federal and state requirements which are legally applicable or relevant and appropriate to the remedial action, and are cost effective.

1.0.4 The purpose of this Explanation of Significant Differences (ESD) to the ROD is to document significant changes to the remedies at DDJC-Tracy. This ESD addresses institutional controls at sites located throughout the depot, as well as changes to the remedy for Solid Waste Management Unit (SWMU) 6, SWMU 8, SWMU 20, and the Defense Site Environmental Reporting and Tracking System (DSERTS) 67 site (Figure 1-3). This ESD was prepared in accordance with *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision*

Documents (U.S. Environmental Protection Agency [U.S. EPA], 1999).

1.1 History of Remedial Activities

1.1.1 In early 1980, a records search by the U.S. Army Toxic and Hazardous Materials Agency (USATHAMA) identified several waste sites (SWMUs) at DDJC-Tracy with contaminants that could migrate to off-depot locations. The records search concluded that waste disposal practices between 1940 and the mid-1970s—including the use of burning to dispose of wastes, operation of underground sumps/tanks, and use of unlined drainage and sewage leaching ponds—probably were responsible for the reported contamination (USATHAMA, 1980).

1.1.2 Results of continuing investigations led to DDJC-Tracy being listed on the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) National Priorities List (NPL) as a Superfund site in 1991. On 27 June 1991, DDJC-Tracy, the U.S. EPA Region 9, and the California Department of Toxic Substances Control (DTSC) signed a Federal Facilities Agreement (FFA) for DDJC-Tracy. This FFA has enforceable schedules; it ensures that environmental impacts are thoroughly investigated and that appropriate cleanup actions are taken to protect human health, welfare, and the environment. Consistent with the requirements of the FFA, the U.S. EPA, DTSC, and the California Regional Water Quality Control Board (RWQCB) provide regulatory oversight, including technical support, review, and comment on all investigative and cleanup work at DDJC-Tracy.

1.1.3 Following the signing of the FFA, contaminated groundwater was identified as the “principal threat” at the depot, and actions to address contaminated groundwater were given priority. *The Operable Unit No. 1 Record of Decision* (OU 1 ROD)¹ (Woodward-Clyde Consultants, 1993) was signed in August 1993;

¹ In this document, the term ROD refers to the *Sitewide Comprehensive Record of Decision*. The *Operable Unit No. 1 Record of Decision* is referred to as the OU 1 ROD.

it specifies groundwater extraction and treatment as the remedy for OU 1.

1.1.4 At the same time, a remedial investigation/feasibility study (RI/FS) was initiated to more thoroughly evaluate the contamination associated with OU 1 and to address the areas of soil contamination that were not addressed as part of the OU 1 ROD (Montgomery Watson, 1996). The RI/FS report includes an evaluation of possible remedies for the sites identified as posing a threat to human health or the environment. A proposed plan (Montgomery Watson, 1997a) was then prepared for public review. The purpose of the proposed plan was to describe recommended remedies, provide information to the public about the actions planned at the sites, and encourage public input prior to making a final decision on a remedy.

1.1.5 Following the public comment period for the proposed plan, the *DDJC-Tracy Site-wide Comprehensive Record of Decision* (Radian International, 1998a) was developed and finalized (April 1998) in accordance with applicable federal and state laws, regulations, and codes. The ROD modifies the remedy for OU 1 groundwater and addresses all areas of soil contamination at the depot.

1.1.6 Subsequent to publication of the ROD, an ESD and ROD Amendment were completed that modified the selected remedy. This is the second ESD to the ROD. Table 1-1 summarizes the decision documents that have been prepared for DDJC-Tracy to date.

1.2 Basis for Explanation of Significant Differences

1.2.1 The basis for the significant changes documented in this ESD is specific to each site or issue and is described in the following sections of this document:

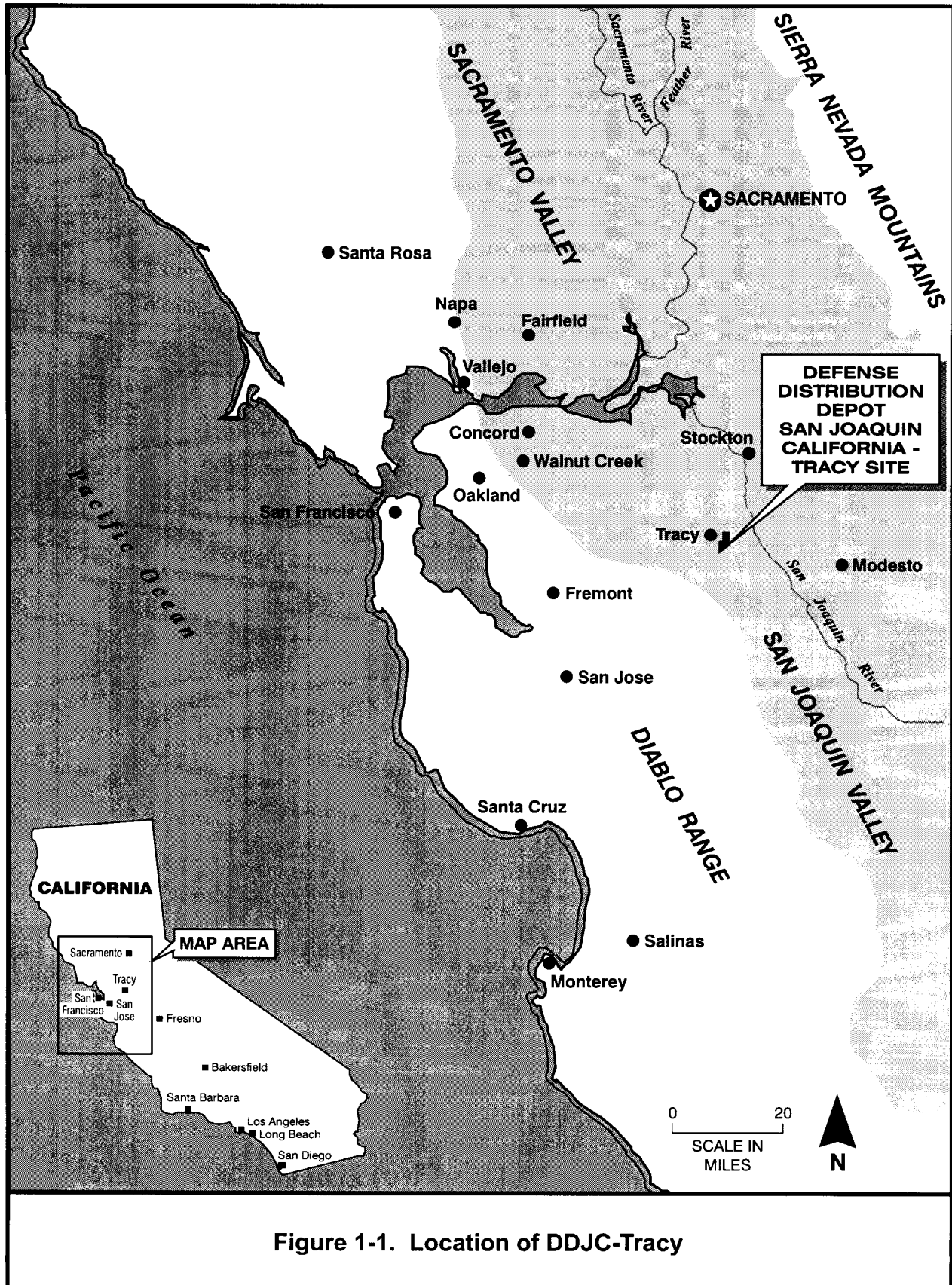
- Section 2: Institutional Controls at DDJC-Tracy;
- Section 3: SWMU 6 (evaluation of contamination left in place and institutional controls);

- Section 4: SWMU 8 (evaluation of contamination left in place and institutional controls);
- Section 5: SWMU 20 (evaluation of soil vapor extraction and institutional controls); and
- Section 6: DSERTS 67 (evaluation of aggregate cover and institutional controls).

1.2.2 This ESD documents changes to the selected remedial action for the DDJC-Tracy installation developed in accordance with §117 of CERCLA, as amended by the Superfund Amendment and Reauthorization Act (SARA). The modified remedies are also in compliance with the National Oil and Hazardous Substances Pollution Contingency Plan, referred to as the National Contingency Plan (NCP), §300.435(c)(2)(ii), and Chapter 6.8 of the California Health and Safety Code, Section 25300, et seq. Further, these actions are being taken in response to the California Water Code (Section 13300, et seq.).

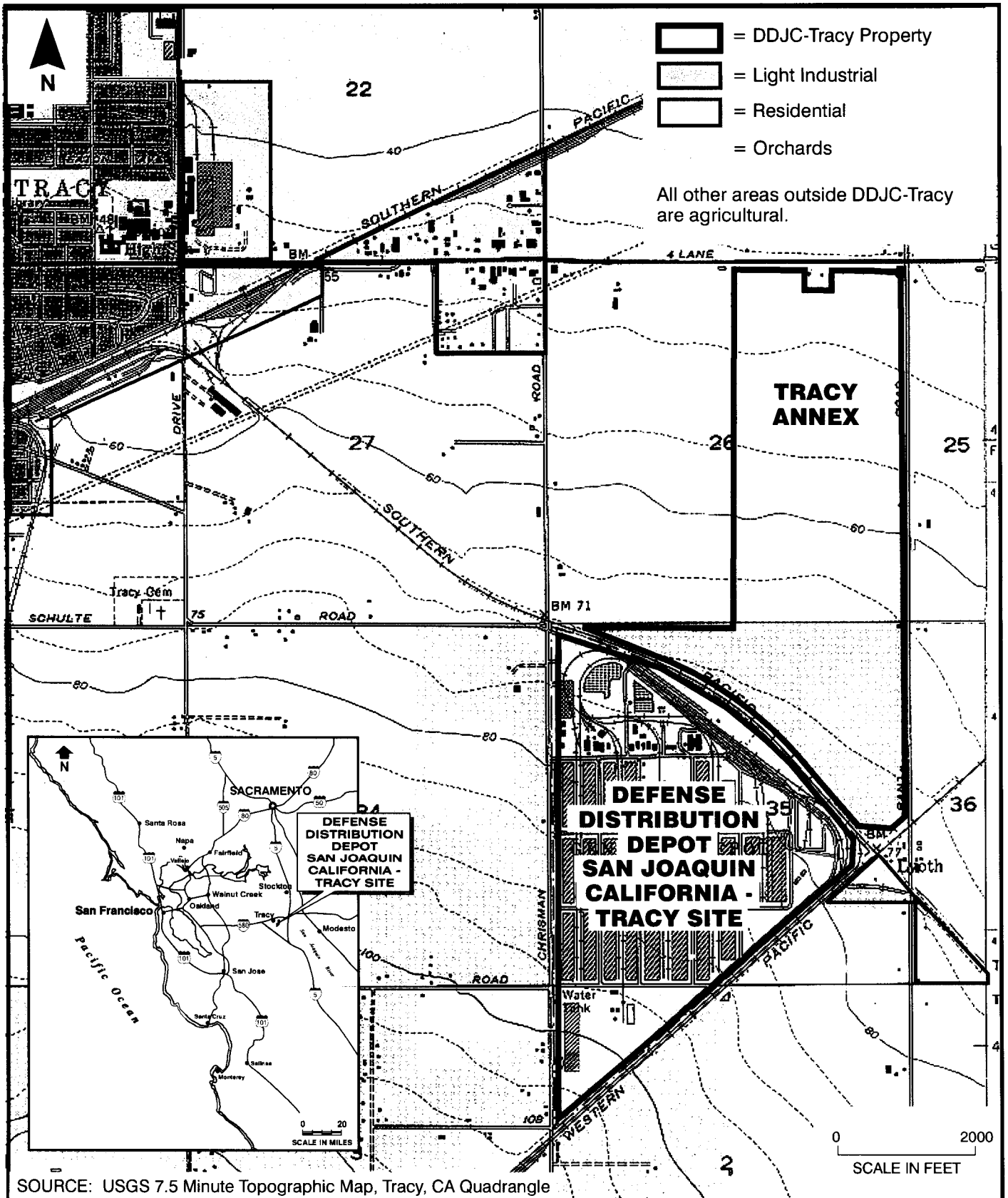
1.3 Administrative Record

This ESD will become part of the Administrative Record file (NCP 300.825 (a)(9)(2)). This file is available to the public at two locations. DDJC-Tracy, Building 100, Room 2, contains documents that have been issued within the past two years. DDJC-Tracy, Warehouse 1, Section 1, contains documents that are older than two years. The Administrative Record is available for viewing between the hours of 7 a.m. and 3 p.m. To arrange to view the Administrative Record, a visitor should call (209) 839-4065.



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Figure 1-2. Site Map, DDJC-Tracy

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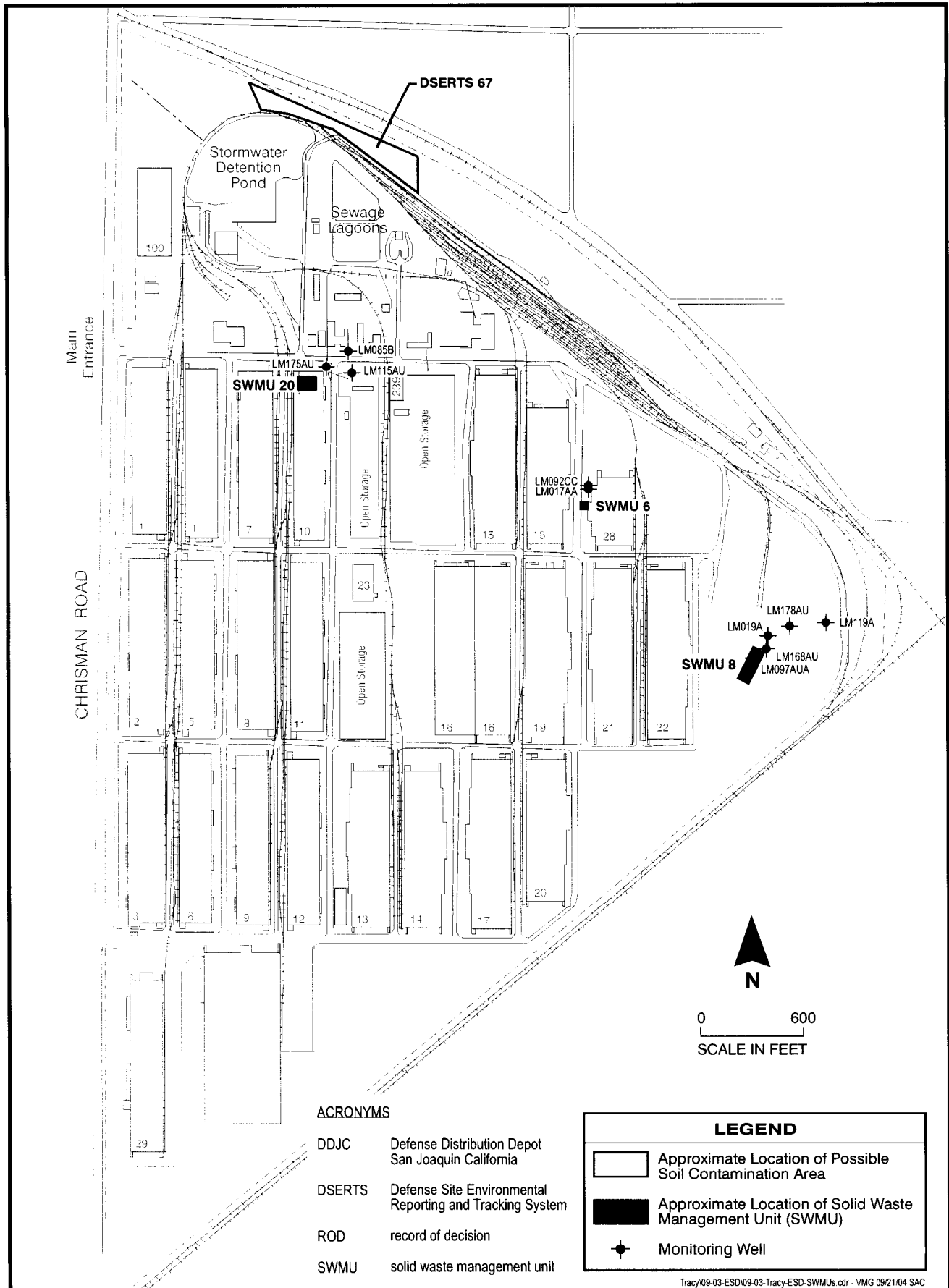


Figure 1-3. Locations of SWMU 6, SWMU 8, SWMU 20, and DSERTS 67, DDJC-Tracy

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Table 1-1. Previous Decision Documents for DDJC-Tracy

Document	Description
<i>Operable Unit No. 1, Record of Decision, Defense Distribution Region West-Tracy, California.</i> Final. August (Woodward-Clyde Consultants, 1993).	<ul style="list-style-type: none"> • Focused ROD addressing groundwater concerns at DDJC-Tracy. • Superseded by the Sitewide Comprehensive ROD.
<i>DDJC-Tracy Sitewide Comprehensive Record of Decision.</i> Final. Prepared for U.S. Army Corps of Engineers, Huntsville, Alabama. Final. April (Radian International, 1998a).	<ul style="list-style-type: none"> • Modified the remedy for OU 1 groundwater. • Identified remedies for all soil sites at the depot.
<i>Explanation of Significant Differences to the Selected Remedies in the ROD for SWMUs 2, 3, 7, and 33, Building 30 Drum Storage Area, and the Northern Depot Soils Area.</i> Final. Prepared for U.S. Army Corps of Engineers, Huntsville, Alabama. July (URS, 2001).	<ul style="list-style-type: none"> • Revised cleanup standards for SWMUs 2 and 3 on the basis of the results from additional risk assessment. • Corrected cleanup standards for the Northern Depot Soils Area (DSERTS 67). Also modified requirements for the cover and added institutional controls. • Clarified institutional controls for SWMU 7, SWMU 33, and the Building 30 Drum Storage Area. Also clarified the institutional controls required at all sites with soil contamination in the event of a change in land use.
<i>Amendment to the Sitewide Comprehensive Record of Decision.</i> Final. Prepared for U.S. Army Corps of Engineers, Huntsville, Alabama. December (URS, 2003a).	<ul style="list-style-type: none"> • Revised cleanup standards for SWMU 4 on the basis of the results from additional risk assessment. Required land use controls including annual reporting and modification of the installation master plan. • Added option for overland flow discharge of treated groundwater to supplement the remedy for OU 1 groundwater. • Addressed DSERTS 72, a new site discovered after completion of the ROD. Required land use controls including annual reporting and modification of the installation master plan.
DDJC = Defense Distribution Depot San Joaquin California DSERTS = Defense Site Environmental Reporting and Tracking System OU = operable unit ROD = record of decision SWMU = solid waste management unit URS = URS Group, Inc.	

